

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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HC2, INC.,	:	
	:	Civil Action No.: 1:20-cv-3178 (LJL)
Plaintiff-Counter Defendant,	:	
	:	
-v-	:	NOTICE OF PLAINTIFF-COUNTER
	:	DEFENDANT HC2, INC.'S MOTION
ANDREW DELANEY,	:	TO DISMISS DEFENDANT-COUNTER
	:	CLAIMANT'S COUNTERCLAIMS
	:	
Defendant-Counter Claimant.	:	
	:	
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PLEASE TAKE NOTICE that, upon the Defendant-Counter Claimant Andrew Delaney's Counterclaims, dated May 13, 2020 (ECF No. 26); the accompanying Memorandum of Law in Support of Plaintiff-Counter Defendant HC2, Inc.'s Motion to Dismiss Defendant-Counter Claimant's Counterclaims; the Declaration of Ronald R. Rossi dated June 3, 2020; the exhibits annexed thereto; and upon all prior pleadings and proceedings had herein, Plaintiff-Counter Defendant HC2, Inc. ("HC2"), by its attorneys, Kasowitz Benson Torres LLP, will move this Court, before the Honorable Lewis L. Liman, United States District Judge, Southern District of New York, via telephonic oral conference at a date and time designated by the Court, for an Order granting HC2's motion, pursuant to Federal Rule of Civil Procedure Rule 12(b)(6), dismissing Defendant-Counter Claimant Andrew Delaney's Counterclaims in their entirety and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
June 3, 2020

Respectfully submitted,

KASOWITZ BENSON TORRES LLP

By: /s/ Ronald R. Rossi

Marc E. Kasowitz

Ronald R. Rossi

Kalitamara L. Moody

1633 Broadway

New York, NY 10019

Telephone: (212) 506-1700

Facsimile: (212) 506-1800

*Attorneys for Plaintiff-Counter Defendant
HC2, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ *Ronald R. Rossi*

Ronald R. Rossi